

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**JORGE ANTONIO FUENTES DELGADO
ISABEL MILAGROS DAVILA PEREIRA**

Debtors

CASE NO. 16-04797 (MCF)

CHAPTER 13

**UNITED STATES TRUSTEE'S MOTION REQUESTING
APPROVAL OF STIPULATION DENYING DISCHARGE**

TO THE HONORABLE COURT:

Nancy J. Gargula, United States Trustee for Region 21 (the "United States Trustee"), by and through her undersigned attorney, requests that the Court approve the attached Stipulation Denying Discharge. In support of this motion, the United States Trustee respectfully states and prays as follows:

1. The United States Trustee has been reviewing the Debtors' financial affairs and right to a discharge pursuant to 11 U.S.C. § 1328, or whether the case should be dismissed under 11 U.S.C. § 1307, among other remedies.

2. The parties wish to avoid the expense and delay of litigation. Therefore, the Debtors have agreed, without making any admissions, to subscribe the attached Stipulation Denying Discharge.

WHEREFORE, the United States Trustee respectfully requests that the Court enter an order approving the attached Stipulation, and grant such other and further relief as the Court deems appropriate.

NOTICE

WITHIN TWENTY-ONE (21) DAYS AFTER SERVICE AS EVIDENCED BY THE CERTIFICATE OF SERVICE BELOW, AND AN ADDITIONAL THREE (3) DAYS PURSUANT TO FED. R. BANK. P. 9006(f) IF YOU WERE SERVED BY MAIL, ANY PARTY AGAINST WHOM THIS PAPER HAS BEEN SERVED, OR ANY OTHER PARTY TO THE ACTION WHO OBJECTS TO THE RELIEF SOUGHT HEREIN, SHALL SERVE AND FILE AN OBJECTION OR OTHER APPROPRIATE RESPONSE TO THIS PAPER WITH THE CLERK'S OFFICE OF THE U.S. BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO. IF NO OBJECTION OR OTHER RESPONSE IS FILED WITHIN THE TIME ALLOWED HEREIN, THE PAPER WILL BE DEEMED UNOPPOSED AND MAY BE GRANTED UNLESS: (i) THE REQUESTED RELIEF IS FORBIDDEN BY LAW; (ii) THE REQUESTED RELIEF IS AGAINST PUBLIC POLICY; OR (iii) IN THE OPINION OF THE COURT, THE INTEREST OF JUSTICE REQUIRES OTHERWISE.

UNITED STATES TRUSTEE'S MOTION REQUESTING APPROVAL OF STIPULATION
IN RE: Jorge Antonio Fuentes Delgado and Isabel Milagros Davila Pereira 16-04797 (MCF)

Page 2 of 3

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that on this day I electronically filed a true and exact copy of the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all CM/ECF participants.

- **JUAN C FORTUNO FAS** bkfilings@fortuno-law.com, fortunof@ecf.inforuptcy.com
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Manual Notice List

Jefferson Capital Systems LLC
PO Box 7999
St Cloud, MN 56302-9617

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

I DO HEREBY FURTHER CERTIFY that on this same date a true and exact copy of the foregoing has been sent by regular United States mail to Debtors, at the following address:

JORGE ANTONIO FUENTES DELGADO
ISABEL MILAGROS DAVILA PEREIRA
URB VILLAS DE LOIZA
CALLE 45 A DD 2
CANOVANAS, PR 00729

UNITED STATES TRUSTEE'S MOTION REQUESTING APPROVAL OF STIPULATION
IN RE: Jorge Antonio Fuentes Delgado and Isabel Milagros Davila Pereira 16-04797 (MCF)

Page 3 of 3

DATED: May 20, 2021

NANCY J. GARGULA
United States Trustee for Region 21

U.S. DEPARTMENT OF JUSTICE
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(Electronically Filed)

By: s/ Monsita Lecaroz Arribas
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